

NICOLETTI HORNIG & SWEENEY  
Wall Street Plaza  
88 Pine Street, 7<sup>th</sup> Floor  
New York, New York 10005-1801  
Tel: (212) 220-3830  
Fax: (212) 220-3780  
*Attorneys for Defendant*  
**OCEANIC BRIDGE INTERNATIONAL INC.**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
MED-ASIA SHIPPING LIMITED

Plaintiff,

07 CIV 6258 (LTS) (AJP)

OCEANIC BRIDGE INTERNATIONAL,  
INC., d/b/a OCEANIC BRIDGE INTL, INC.  
DALIAN BRANCH, a/k/a DALIAN  
OCEANIC BRIDGE INTERNATIONAL  
FORWARDING CO., LTD.,

Defendants.

**NOTICE OF MOTION**

**ORAL ARGUMENT REQUESTED**

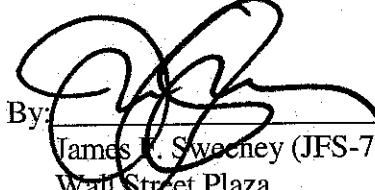
SIRS:

PLEASE TAKE NOTICE that Defendant OCEANIC BRIDGE INTERNATIONAL INC. (incorrectly sued herein as "d/b/a OCEANIC BRIDGE INTL, INC. DALIAN BRANCH, a/k/a DALIAN OCEANIC BRIDGE INTERNATIONAL FORWARDING CO., LTD.") will move this Court on or before August 31, 2007 at 9:30 a.m. or as soon thereafter as counsel may be heard, to vacate the attachments herein pursuant to Rule E (4)(f) of the Supplemental Rules for Admiralty Or Maritime Claims and to dismiss the Complaint pursuant to Rules 12(b)(2) and (6) of the Federal Rules of Civil Procedure.

Pursuant to Rule 2(B) of the Individual Practices of this Court, the undersigned hereby certifies that he has used his best efforts to informally resolve the issues raised by this Motion.

Dated: New York, New York  
August 6, 2007

NICOLETTI HORNIG & SWEENEY  
Attorneys for Defendant  
*OCEANIC BRIDGE INTERNATIONAL INC.*

By: 

James K. Sweeney (JFS-7745)  
Wall Street Plaza  
88 Pine Street, 7<sup>th</sup> Floor  
New York, New York 10005-1801  
Telephone No.: (212) 220-3830  
Facsimile No.: (212) 220-3784  
E-mail: jsweeney@nicolettihornig.com  
(FILE NO.: 99000003 JFS)

TO:

Richard A. Zimmerman, Esq.  
Suite 2202  
233 Broadway  
New York, New York 10279  
Attorneys for Plaintiff

NICOLETTI HORNIG & SWEENEY  
Wall Street Plaza  
88 Pine Street, 7<sup>th</sup> Floor  
New York, New York 10005-1801  
Tel: (212) 220-3830  
Fax: (212) 220-3780  
*Attorneys for Defendant*  
**OCEANIC BRIDGE INTERNATIONAL INC.**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----  
**MED-ASIA SHIPPING LIMITED**

Plaintiff,

07 CIV 6258 (LTS) (AJP)

OCEANIC BRIDGE INTERNATIONAL,  
INC., d/b/a OCEANIC BRIDGE INTL, INC.  
DALIAN BRANCH, a/k/a DALIAN  
OCEANIC BRIDGE INTERNATIONAL  
FORWARDING CO., LTD.,

**AFFIDAVIT OF  
JAMES F. SWEENEY**

Defendants.

-----  
x

JAMES F. SWEENEY, being duly sworn, deposes and says:

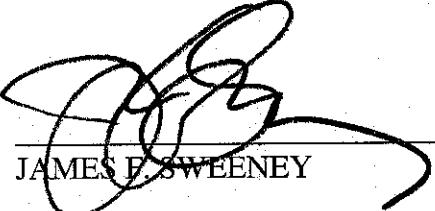
1. I am an attorney at law, duly admitted to practice before this Honorable Court and I make this Affidavit in support of Defendant OCEANIC BRIDGE INTERNATIONAL INC.'s motion to vacate the attachments and dismiss the Verified

Complaint.

2. Attached hereto as Exhibit 1 is a true and correct copy of this Court's Order dated July 6, 2007.

3. Attached hereto as Exhibit 2 is a true and correct copy of the Declaration of Tong Tang.

4. Attached hereto as Exhibit 3 is a true and correct copy of the Declaration of Ma Lijun.



JAMES F. SWEENEY

Sworn to before me  
this 6th day of August, 2007



MARY ANN RAARUP  
Notary Public

MARY ANN RAARUP  
Notary Public, State of New York  
No. 01RA4874099  
Qualified in Suffolk County  
Certificate filed in New York County  
Commission Expires Oct. 20, 2010

X:\Public\Word Files\9913\LEGAL\AFFIDAVIT OF JFS. (8-3-07) sa.doc

## **EXHIBIT 1**

SWAIN, S.

# JUDGE SWAIN

Richard A. Zimmerman, Esq.  
Attorney for Plaintiff  
233 Broadway – Suite 2202  
New York, NY 10279  
Richard A. Zimmerman (RZ 0963)  
Patrick C. Crilley (PC 9057)  
(212) 962-1818

07 CV 6258

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: 7-6-07  
DATE FILED: 7-6-07

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MED-ASIA SHIPPING LIMITED

ECF CASE

Plaintiff,

-against-

OCEANIC BRIDGE INTERNATIONAL,  
INC., d/b/a OCEANIC BRIDGE INTL INC.  
DALIAN BRANCH, a/k/a DALIAN  
OCEANICBRIDGE INTERNATIONAL  
FORWARDING CO., LTD.,

07 Civ. 6258 (LTS) (AJP)

ORDER DIRECTING CLERK TO  
ISSUE PROCESS OF MARITIME  
ATTACHMENT AND  
GARNISHMENT

Defendants.

Upon reading and filing the Verified Complaint of Plaintiff verified on the 6th day of July, 2007, and the declaration of Patrick C. Crilley, Esq., declared to on the 6th day of July, 2007, that to the best of his information and belief, the Defendants cannot be found within this District, and the Court having found that the conditions required by Rule B(1) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure exist,

NOW, upon motion of Patrick C. Crilley, of counsel to Richard A. Zimmerman, Esq., attorney for Plaintiff, it is hereby,  
ORDERED, that the Clerk of this Court is authorized to issue the Process of Maritime Attachment and Garnishment against all claims, assets, cash, funds, credits, wire

transfers, accounts, letters of credit, electronic fund transfers, freights, sub-freights, charter hire, sub- charter hire, or any other tangible and/or intangible assets belonging to, due, claimed by, being held for or on behalf of, or being transferred for the benefit of Defendants, OCEANIC BRIDGE INTERNATIONAL, INC., OCEANIC BRIDGE INTL INC. DALIAN BRANCH, and DALIAN OCEANICBRIDGE INTERNATIONAL FORWARDING CO., LTD., including any such assets as may be in the possession, custody or control of, or being transferred through any garnishee within this District, including, without limitation, assets held by or at:

- a) The Bank of New York, Inc.
- b) Citibank N.A.
- c) HSBC Bank USA, N.A.
- d) JPMorgan Chase
- e) UBS AG
- f) Bank Of America, N.A.
- g) Standard Chartered Bank,
- h) Northern Trust Corporation,
- i) American Express Bank
- j) Credit Suisse First Boston,
- k) Nordea Bank Denmark,
- l) Nordea Bank Finland PLC,
- m) Belgolaise Bank
- n) Australia and New Zealand Banking Group Ltd.,
- o) ANZ (Delaware) Inc.,
- p) Fortis Financial Services LLC,
- q) Fortis (USA) Financial LLC,
- r) Calyon Corporate and Investment Bank
- s) Bank of China
- t) Deutsche Bank,
- u) Danske Bank,
- v) Barclays Bank,
- w) Banque Cantonale de Geneve
- x) BNP Paribas and/or
- y) Commerce Bank,

and said Order being equally applicable to any other garnissees upon whom a copy of the Process of Maritime Attachment and Garnishment herein may be served, in an amount up

to and including \$1,310,680.00, pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure; and it is further ORDERED, that any person claiming an interest in the property attached or garnished pursuant to said Order shall, upon application to the Court be entitled to a prompt hearing at which the Plaintiff shall be required to show why the attachment and garnishment should not be vacated or other relief granted; and it is further

ORDERED, that supplemental process enforcing the Court's Order may be issued by the Clerk upon application without further Order of the Court; and it is further

ORDERED, that following initial service upon any garnishee by the United States Marshal or any other person designated or authorized by Order to make service in this action, subsequent and/or supplemental service of Process of Maritime Attachment and Garnishment may thereafter be made by way of facsimile transmission or other verifiable electronic means, including e-mail, to each garnishee so personally served; and it is further

ORDERED, that each garnishee so personally served shall promptly furnish to the United States Marshal or to any other persons designated or authorized by Order to make service in this action, a facsimile number or an e-mail address at which supplemental and/or subsequent service may be made by verifiable electronic means and that such supplemental and/or subsequent service to the designated facsimile number or email address shall be deemed service within this District; and it is further

ORDERED, that service on any garnishee herein is deemed to be effective and continuous service throughout the remainder of the day upon which such service is made commencing from the time of such service through the opening of garnishee's business the next business day.

ORDERED, that a copy of this Order be attached to and served with the said Process of Maritime Attachment and Garnishment.

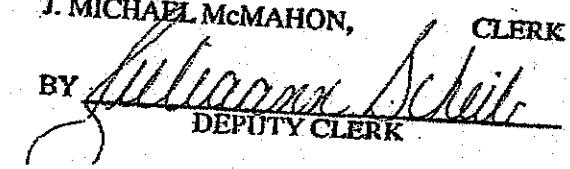
Dated: July 6, 2007  
New York, New York

SO ORDERED:

  
U.S.D.J.

A CERTIFIED COPY  
J. MICHAEL McMAHON,

BY

  
CLERK  
DEPUTY CLERK

## **EXHIBIT 2**

8/1/07

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x  
MED-ASIA SHIPPING LIMITED

Plaintiff,

07 CIV 6258 (LTS) (AJP)

OCEANIC BRIDGE INTERNATIONAL,  
INC., d/b/a OCEANIC BRIDGE INTL, INC.  
DALIAN BRANCH, a/k/a DALIAN  
OCEANICBRIDGE INTERNATIONAL  
FORWARDING CO., LTD.,

**DECLARATION OF  
TONG TANG**

Defendants.

-----x

Pursuant to 28 U.S.C. § 1746, Tong Tang declares as follows:

1. I am the President of Oceanic Bridge International Inc, a named defendant herein.
2. I make this Declaration based upon my personal knowledge of the facts and circumstances herein.
3. Oceanic Bridge International Inc. ("OB") is engaged in business as a licensed, bonded and tariffed NVOCC ("Non Vessel Owning Common Carrier") and an international freight forwarder. OB was incorporated under and pursuant to the laws of the State of California in 1994. A copy of OB's Certificate of Incorporation is attached hereto as Exhibit A.
4. OB owns forty (40%) percent of the outstanding shares of Dalian Oceanic Bridge International Forwarding Co., Ltd., but the companies are operated and run separately and independently of one another, and OB does not direct or control the business activities of Dalian Oceanic Bridge International Forwarding Co., Ltd.

5. Dalian Oceanic Bridge International Forwarding Co., Ltd. is a separate and distinct corporate entity organized and existing under and by virtue of the laws of the People's Republic of China.

6. OB's corporate books and records, its board of directors meetings, its tax filings, and regulatory filings (i.e. Federal Maritime Commission filings) all are kept and made independently of Dalian Oceanic Bridge International Forwarding Co., Ltd.

7. OB's bank accounts, monies, properties and/or other assets are kept in accounts separate and apart from those of Dalian Oceanic Bridge International Forwarding Co., Ltd. The two entities do not have any joint bank accounts and none of OB's funds are intermingled with Dalian Oceanic Bridge International Forwarding Co., Ltd.'s funds.

8. Apart from a common Director/President namely myself, OB and Dalian Oceanic Bridge International Forwarding Co., Ltd. do not have any overlap in officers, directors and/or personnel. The corporate officers of OB are:

Tong Tang President

Cathy Guo Vice President

Lisa Song Secretary

Lisa Song Treasurer

The directors of OB are:

Tong Tang

Lisa Song

OB and Dalian Oceanic Bridge International Forwarding Co., Ltd. have no overlap in personnel or employees and the respective payrolls for each company are kept and made separately and independently of one another.

9. OB and Dalian Oceanic Bridge International Forwarding Co., Ltd. share no common office space, address, telefax or telephone numbers. OB has its only office at 18725 East Gale Avenue, Suite #233, City of Industry California. Its telephone number is (626) 839-7755. While Dalian Oceanic Bridge International Forwarding Co., Ltd. has various offices and addresses, they are all located within the People's Republic of China. Dalian Oceanic Bridge International Forwarding Co., Ltd. has no offices in the United States.

10. Dalian Oceanic Bridge International Forwarding Co., Ltd. acts independently and apart from OB. It acts solely at its own discretion in its business dealings, without seeking or requiring the authority or approval of OB. Dalian Oceanic Bridge International Forwarding Co., Ltd. negotiates and concludes its own contracts, it pays its own rent, it pays its own taxes, it invoices for its own services, it issues documents under its own name, it enters into business dealings in its own name and for its own account.

11. OB and Dalian Oceanic Bridge International Forwarding Co., Ltd. do not and have not, acted as either joint venturers and/or partners together in any business enterprises, including the chartering of the M.V. ELENI K, the M.V. SEA BIRD and/or the M.V. SACURA, the three (3) vessels mentioned in the Verified Complaint.

12. The business dealings between OB and Dalian Oceanic Bridge International Forwarding Co., Ltd. are always conducted at "arm's-length", and without any preferential treatment given from one to the other.

13. OB and Dalian Oceanic Bridge International Forwarding Co., Ltd. are independent profit centers. Business losses (and profits), if any, sustained by Dalian Oceanic Bridge International Forwarding Co., Ltd. are for its own account and are not reflected in OB's books or accountings. Dalian Oceanic Bridge International Forwarding Co., Ltd. is responsible for its own business success or failure.

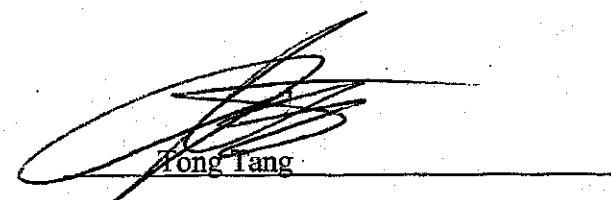
14. OB has never paid, nor guaranteed payment of any of Dalian Oceanic Bridge International Forwarding Co., Ltd.'s corporate debts or obligations.

15. As aforesaid, (see ¶ 7 hereof), there is no intermingled or commingled property between OB and Dalian Oceanic Bridge International Forwarding Co., Ltd.

16. OB does not hold maintain or possess any assets of Dalian Oceanic Bridge International Forwarding Co., Ltd., nor does it make payments for or on behalf of Dalian Oceanic Bridge International Forwarding Co., Ltd.

17. In sum, there has been no domination or disregard by OB of the separate and distinct corporate identity of Dalian Oceanic Bridge International Forwarding Co., Ltd. To the contrary, corporate independence between these parties has been maintained at all times.

I declare under penalty of perjury that the foregoing is true and correct.

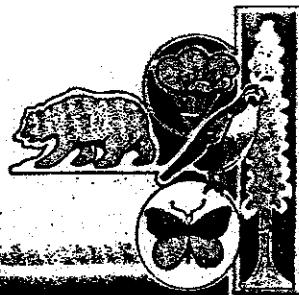


Tong Tang

Executed on July,31, 2007  
City of Industry, California

## **EXHIBIT A**

1753826



**State  
of  
California**  
SECRETARY OF STATE'S OFFICE

CORPORATION DIVISION

I, **TONY MILLER**, Acting Secretary of State of the State of California, hereby certify:

That the annexed transcript has been compared with the corporate record on file in this office, of which it purports to be a copy, and that same is full, true and correct.

IN WITNESS WHEREOF, I execute this certificate and affix the Great Seal of the State of California this

NOV 16 1994



*Tony Miller*

Acting Secretary of State



1753826

ENDORSED  
FILED

in the office of the Secretary of State  
of the State of California

ARTICLES OF INCORPORATION

OF

OCEANIC BRIDGE INTERNATIONAL, INC.

NOV 16 1994

TONY MILLER  
Acting Secretary of State

ONE: The name of this corporation is OCEANIC BRIDGE  
INTERNATIONAL, INC.

TWO: The purpose of the corporation is to engage in any  
lawful act or activity for which a corporation may be organized  
under the General Corporation Law of California other than the  
banking business, the trust company business, or the practice of  
a profession permitted to be incorporated by the California  
Corporation Code.

THREE: The name and address of the corporation's initial  
agent for the service of process in this state is:

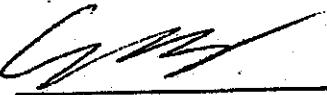
TANG TONG  
409 W. Main Street  
Alhambra, CA 91801

FOUR: This corporation is authorized to issue only one  
class of shares of stock, and the total number of shares which  
this corporation is authorized to issue is 100,000.

DATED: November 16, 1994

  
WILLIAM S. WANG  
Incorporator

I declare that I am the person who executed the above  
Articles of Incorporation, and that this instrument is my act and  
deed.

  
WILLIAM S. WANG

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----  
MED-ASIA SHIPPING LIMITED

Plaintiff

07 CIV 6258 (LTS) (AJF)

OCEANIC BRIDGE INTERNATIONAL,  
INC. d/b/a OCEANIC BRIDGE INT'L, INC.  
DALIAN BRANCH, a/k/a DALIAN  
OCEANIC BRIDGE INTERNATIONAL  
FORWARDING CO., LTD.

DECLARATION OF  
MA LIJUN

Defendants

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Pursuant to 28 U.S.C. §1746, Ma Lijun declares as follows:

1. I am the General Manager of Dalian Oceanic Bridge International Forwarding Co., Ltd.

2. I make this Declaration based upon my personal knowledge of the facts and circumstances herein.

3. Dalian Oceanic Bridge International Forwarding Co., Ltd. ("Dalian") is engaged in business as an international freight forwarder. Dalian was incorporated under and pursuant to the laws of the People's Republic of China. A copy of Dalian's "Certificate of Approval/Corporate Person Business License" is attached hereto as Exhibit A.

4. Oceanic Bridge International, Inc. ("OB") owns forty (40%) percent of the outstanding shares of Dalian, but the companies are operated and run separately and independently of one another, and OB does not direct or control the business activities of Dalian.

5. Dalian is a separate and distinct corporate entity organized and existing under and by virtue of the laws of the People's Republic of China.

6. Dalian's corporate books and records, its board of directors meetings, its tax filings, and regulatory filings (i.e. filings with the People's Republic of China) all are kept and made independently of OB.

7. Dalian's bank accounts, monies, properties and/or other assets are kept in accounts separate and apart from those of OB. Dalian does not maintain any bank accounts in the United States. The two corporate entities do not have any joint bank accounts and none of Dalian's funds are intermingled with OB's funds.

8. Apart from a common President/director, Dalian and OB do not have any overlap in officers, directors and/or personnel. The corporate officers of Dalian are:

Tong Tang

President

Ma Lijun

General Manager

Zhan Wei

CFO

Wu Yanvum

Treasurer

The directors of Dalian are:

Tong Tang

Jia Dequan

Wang Tonghui

Dalian and OB have no overlap in personnel or employees and the respective payrolls for each company are kept and made separately and independently of one another.

9. Dalian and OB share no common office space, address, telefax or telephone numbers. OB has its only office at 18725 East Gale Avenue, Suite #232, City of Industry, California. Its telephone number is (626) 829-7755. While Dalian has various offices and addresses, they are all located within the People's Republic of China. Dalian has no offices in the United States. Dalian is not licensed or authorized to do business in any state in the United States. Dalian's offices are located as follows with telephone and telefax numbers:

Dalian Oceanic Bridge Int'l Forwarding Co., Ltd. (Headquarters Office)  
Address: 51802 Gold Name Commercial Tower, 68 Renmin Rd., Dalian China 116001  
Tel: +86-411-88991222  
Fax: +86-411-82727580/889991212

Tianjin Branch Office:  
Address: #705 Waidai Building, 5 Xuzhou Rd., Hexi Dist, Tianjin, China 3000420  
Tel: +86-22-23397903  
Fax: +86-22-23398235

Qingdao Branch Office:  
Address: A-6-G, Tower A of Jindu Garden, No. 37 Donghai Xi Rd., Qingdao, China 266071  
Tel: +86-532-85798380/1 85798390/1726  
Fax: +86-532-85796866/99

Shanghai Branch Office:  
Address: 216 Tangshan Rd., Shanghai, China 2000032  
Tel: +86-21-63422360  
Fax: +86-21-65868742/65361751

Ningbo Branch Office:  
Address: C-17-C19, 9 Floor, Xinhuadian Building, 53 Dongdu Rd., Ningbo, China 315000  
Tel: +86-574-87092852  
Fax: +86-574-87092849

**Xiamen Branch Office:**

Address: #502 Haitian Logistic Center, Haitian Rd., Xiamen, China 361006

Tel: +86-592-5606006

Fax: +86-592-5650798/6031588

**Shenzhen Branch Office:**

Address: 7H, The National Trade Commercial Building, Luohu Dist., Shenzhen, China 518000

Tel: +86-755-25190257

Fax: +86-755-25190265

10. Dalian acts independently and apart from OB. It acts solely at its own discretion in its business dealings, without seeking or requiring the authority or approval of OB. Dalian negotiates and concludes its own contracts, it pays its own rent, it pays its own taxes, it invoices for its own services, it issues documents under its own name, it enters into business dealings in its own name and for its own account.

11. Dalian and OB do not and have not, acted as either joint venturers and/or partners together in any business enterprises, including the chartering of the M.V. ILENI K, the M.V. SEA BIRD and/or the M.V. SACURA, the three (3) vessels mentioned in the Verified Complaint.

12. Any business transactions between Dalian and OB are always conducted on "arm's-length", and without any preferential treatment given from one to the other.

13. Dalian and OB are independent profit centers. Business losses (and profits), if any, sustained by Dalian are for its own account and are not reflected in OB's books or accountings. Dalian is responsible for its own business success or failure.

14. OB has never paid, nor guaranteed payment of any of Dalian's corporate debts or obligations.

15. As aforesaid (see ¶ 7 hereof), there is no intermingled or commingled property between Dalian and OB.

16. OB does not hold, maintain or possess any assets of Dalian, nor does it make payments for or on behalf of Dalian.

17. In sum, there has been no domination or disregard by OB of the separate and distinct corporate identity of Dalian. To the contrary, corporate independence between these parties has been maintained at all times.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



Ma Laijun

Executed on August 2, 2007  
Dalian, China

## **EXHIBIT A**



**Global Language Services**  
Translations · Interpreting  
DTP · Localization

**KERN Corporation**  
The Helmsley Building  
230 Park Avenue, Suite 1517  
New York, NY 10169

Tel. (212) 953 2070  
Fax (212) 953 2073  
kern.ny@kerntranslations.com

SS.: [www.e-kern.com](http://www.e-kern.com)

State of: New York  
County of: New York

### CERTIFICATE OF ACCURACY

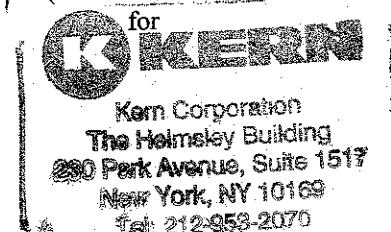
**IT IS HEREBY CERTIFIED**, that *KERN Corporation, a corporation organized and existing under the laws of the State of New York, is professionally engaged in the rendering of foreign language translation services; that it has translated the following document(s)*

### CERTIFICATE OF APPROVAL

*from the CHINESE language into the ENGLISH language  
and that the said translation is a true and correct rendering of the said document to the best of our knowledge and belief.*

Signed by:

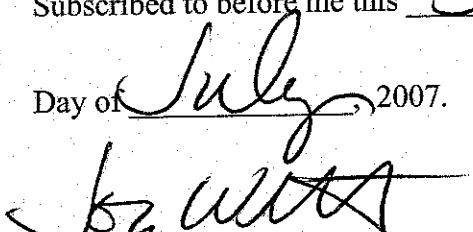
  
(Rosana Chinchilla)



JOY N. WILTERMUTH  
NOTARY PUBLIC, State of New York  
No. 01WI - 6093589  
Qualified in New York County  
My Commission Expires June 2, 2011

Subscribed to before me this 31

Day of July, 2007.

  
Notary Public

San Francisco: The Russ Building · 235 Montgomery Street, Suite 946 · San Francisco, CA 94104  
Tel. (415) 433 5376 · Fax (415) 433 5377 · kern.sf@kerntranslations.com

London: Tel. 011 44 (20) 7831 5600 · Frankfurt: Tel. 011 49 (69) 75 60 73-0 · Berlin: Tel. 011 49 (30) 24 72 12 50 · Paris: Tel. 011 33 (1) 53 93 85 20  
Zurich: Tel. 011 41 (1) 2 61 11 60 · Hong Kong: Tel. 011 (852) 28 50 44 55 · Amsterdam: Tel. 011 31 (20) 6 39 01 19 · Lyon: Tel. 011 33 (4) 783 783 73

[Crest] The People's Republic of China	Name of enterprise English	Chinese 大连海桥运通国际货运代理有限公司
Address of enterprise	Room 1802, Gold Name Commercial Tower, 68 Rennin Rd., Zhongshan District, Dalian City, Liaoning Province, China.	
Type of business	Sino - foreign joint venture	Duration of operation Ten years
Total investment	One point nine six million US Dollars	
Registered capital	One point nine six million US Dollars	
Business Scope	Undertakes the international transportation and forwarding of imported and exported goods shipped by sea, including: solicitation, reservation for cargo space, warehousing, transshipment, container assembly and unpacking, settlement of freight and miscellaneous fees, customs declaration, inspection, insurance, related short haul transportation services and consulting services	
Code for import and export enterprise:	210071093887X	
Date of approval:	[Illegible month and date] 1999	
Date of issue:	[Illegible month and date] 2004	
Names of investors in Chinese and English	Place of registration	Capital contribution
Ying Kou Foreign Economics and Trade Development Corp.	China	Contributed 294,000 US Dollars
China Ying Kou Foreign Ship Agency Co., Ltd.	China	Contributed 882,000 US Dollars
United States Oceanic Bridge International Forwarding Co., Ltd.	United States	Contributed 784,000 US Dollars

[Seal: Ministry of Commerce of the People's Republic of China]  
Sequence No. of certificate issuance: 2100002997

**CORPORATE PERSON BUSINESS LICENSE**  
(Duplicate copy)

No.: 0193863

## NOTES

**Registration No.:** Qi Tai Liao Da Zong Zi No. 009314  
**Name:** Dalian Oceanic Bridge International Forwarding  
 Co., Ltd.  
**Domicile:** Room 1802, Gold Name Commercial Tower, 68  
 Renmin Rd., Zhongshan District, Dalian City

**Legal  
 representative:**

Tang Tong

**Registered capital:** One point eight four million US Dollars

**Capital actually  
 contributed:** One point eight four million US Dollars

**Type of  
 enterprise:**

Sino-foreign joint venture

**Business Scope:**

Undertakes the international transportation and  
 forwarding of imported and exported goods shipped by  
 sea, including: solicitation, reservation for cargo space,  
 warehousing, transhipment, container assembly and  
 unpacking, settlement of freight and miscellaneous  
 fees, customs declaration, inspection, insurance, related  
 short haul transportation services and consulting  
 services.

**Shareholders  
 (sponsors):**

Ying Kou Foreign Economics and Trade Development  
 Corp., Ying Kou Foreign Ship Agency Co., Ltd. of  
 China and Oceanic Bridge International Forwarding  
 Co., Ltd. of the United States

1. A business license for corporate legal person evidences acquisition by an enterprise of corporate legal personhood and legitimate operations.
2. A business license for a corporate legal person has an original copy and duplicate copies, which shall have equal legal validity.
3. The original copy of business license shall be posted conspicuously at the domicile of the corporate legal person.
4. A corporate legal person shall engage in operational activities within the scope approved and registered.
5. Upon any change to registered items of a corporate legal person, an application shall be filed with the corporate registration authorities for registration of such change, and the business license for corporate legal person shall be replaced.
6. Between March 1 and June 30 each year, annual examinations shall be performed on this license.
7. After a business license for corporate legal person is revoked, there shall be no engagement in business activities not related to liquidation enterprise copies of its business license.
8. When an enterprise cancels its registration, it shall return the original and duplicate copies of its business license.
9. When a business license is lost or mutilated, a statement shall be made in a newspaper designated by corporate registration authorities for its invalidation and an application shall be made for its replacement.

## INFORMATION ON ANNUAL INSPECTIONS

2006			
[Seal: Dalian Municipal State Administration of Industry and Commerce]			

## Registration authorities:

[Seal: Dalian Municipal Administration of Industry and Commerce

May 17, 2007

NO. 003757

企 业 名 称 NAME OF ENTERPRISE	中 文 CHINESE 大连普特通国际贸易有限公司	英 文 ENGLISH DLA PLUTON INTERNATIONAL LTD.	
企 业 地 址 ADDRESS	中国辽宁省大连市中山区人民路60号海港大厦22层		
企 业 类 型 TYPE OF BUSINESS	中 外 合 资 企 业 SINO-FOREIGN JOINT VENTURE	经 营 贸 易 业 务 TRADE OF COMMODITIES	
技 术 资 本 TECHNICAL CAPITAL	美金玖拾陆万美元		
注 写 INSCRIPTION	兹向中国政府申请设立外商投资企业，特此申明。		
经 营 范 围 SCOPE OF BUSINESS	从事海运、陆运、空运国际货物运输代理业及进出口贸易、转口贸易、转关贸易、及相关配套服务及咨询业务。		
投 资 者 名 称 ( 中 英 文 ) NAME OF INVESTORS ( IN CHINESE AND ENGLISH )	香港范国公司 VAN GUO CO., LTD.		
批 准 号 码 APPROVAL NUMBER	210071034037X	批 准 日 期 DATE OF APPROVAL	2004-07-01
注 册 资 本 CAPITAL	人民币 400 万元	出 资 方 CREDITORS	范国 200 万元 范国 200 万元 范国 40 万元 范国 40 万元
注 册 地 PLACE OF REGISTRATION	中国		
发 证 机 构 ISSUING INSTITUTION	中国驻外使领馆		
发 证 日期 DATE OF ISSUE	2004年7月1日		

中华人 民共 和 国 外 商 投 资 企 业

批 准 证

CERTIFICATE OF APPROVAL  
FOR ESTABLISHMENT OF FOREIGN INVESTMENT  
IN THE PEOPLE'S REPUBLIC OF CHINA

批 准 号 码  
APPROVAL NUMBER  
注 册 资 本  
CAPITAL  
批 准 日 期  
DATE OF APPROVAL  
发 证 日期  
DATE OF ISSUE

批 准 机 构  
APPROVAL INSTITUTION  
注 册 地  
PLACE OF REGISTRATION

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昭業機器  
營業大業  
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## 名 住 法 通 実 公 经

范类资本本型围表资资类范

## 舊書收購

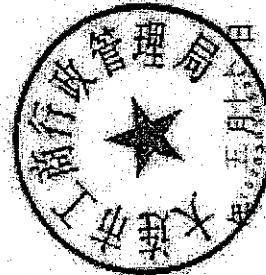
经济林木学报

大連市  
大連市  
大連市

萬葉集

二〇〇八年十一月十六日宣期業

國語文書卷之三



一九〇九年五月一號

二〇〇八年十一月三十日

宣期業銀業

AFFIDAVIT OF SERVICE

STATE OF NEW YORK )  
                         ) ss.:  
COUNTY OF NEW YORK)

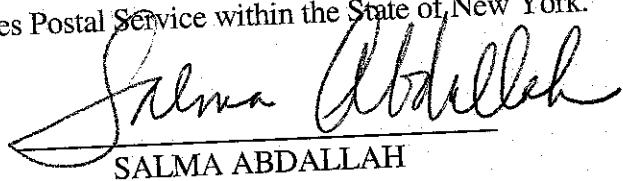
SALMA ABDALLAH, being duly sworn, deposes and says:

1. I am employed by the firm of NICOLETTI HORNIG & SWEENEY, attorneys for Defendant OCEANIC BRIDGE INTERNATIONAL INC. I am not a party to this action, am over 18 years of age, and reside in Brooklyn, New York.

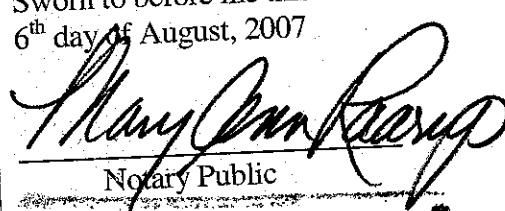
2. On August 6, 2007, I served the annexed **Notice of Motion with the Affidavit of James F. Sweeney and exhibits annexed thereto** upon the following:

Richard A. Zimmerman, Esq.  
Suite 2202  
233 Broadway  
New York, New York 10279  
Attorneys for Plaintiff

at the address(es) designated by said attorney(s) for that purpose, by depositing true copy(ies) of same enclosed in postpaid, properly addressed wrapper(s) in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York.

  
SALMA ABDALLAH

Sworn to before me this  
6<sup>th</sup> day of August, 2007.

  
Notary Public

MARY ANN RAARUP  
Notary Public, State of New York  
No. 01RA4874099  
Qualified in Suffolk County  
Certificate filed in New York County  
Commission Expires Oct. 20, 2010

**AFFIDAVIT OF SERVICE**

SALMA ABDALLAH, being duly sworn, deposes and says:

1. I am employed by the firm of NICOLETTI HORNIG & SWEENEY, attorneys for Defendant OCEANIC BRIDGE INTERNATIONAL INC. I am not a party to this action, am over 18 years of age, and reside in Brooklyn, New York.
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Richard A. Zimmerman, Esq.  
Suite 2202  
233 Broadway  
New York, New York 10279  
Attorneys for Plaintiff

at the address(es) designated by said attorney(s) for that purpose, by depositing true copy(ies) of same enclosed in postpaid, properly addressed wrapper(s) in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York.

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SALMA ABDALLAH

Sworn to before me this  
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